

UNITED STATES DISTRICT COURT **JUDGE PALLMEYER**  
 NORTHERN DISTRICT OF ILLINOIS  
 EASTERN DIVISION

UNITED STATES OF AMERICA )

No. 08 CR 403

v. )

**MAGISTRATE JUDGE ASHMAN**

PETRU CLADOVAN,  
 ANTHONY VALENTINO, and  
 THOMAS ZIROLI

Violations: Title 18, United States Code,  
 Sections 666(a)(1)(B) and 666(a)(2)

**FILED****COUNT ONE**

The SPECIAL JUNE 2007 GRAND JURY charges:

AUG 14 2008

1. At times material to this indictment:

MICHAEL W. DOBBINS  
 CLERK, U.S. DISTRICT COURT

A. The City of Chicago ("the City") was a unit of local government known as a municipal corporation, and a political subdivision of the State of Illinois. The functions and services provided by the City on behalf of its residents were coordinated through various agencies and departments.

B. One of the City's operational departments was the Department of Zoning. The principal function of the Department of Zoning was to enforce the City's Zoning Ordinance. Among other things, zoning inspectors performed inspections in connection with Certificates of Occupancy. A Certificate of Occupancy was a certificate from the City certifying that a structure was fit for human habitation.

C. Another of the City's operational departments was the Department of Buildings. The principal function of the Department of Buildings was to conduct inspections to ensure that buildings conformed and were maintained according to the City's Building Code. One of the types of inspections that could be required was a ventilation inspection performed by a

ventilation and furnace inspector. Among other things, ventilation and furnace inspectors performed inspections in connection with Certificates of Occupancy.

D. Defendant PETRU CLADOVAN was a real estate developer.

E. ANTHONY VALENTINO held the position of Zoning Investigator in the Department of Zoning.

F. THOMAS ZIROLI held the position of Ventilation and Furnace Inspector in the Department of Buildings.

G. The property located at 2754 West Washington Boulevard ("the Washington property") was a multi-unit residential building located in Chicago, and owned by defendant CLADOVAN.

H. Individual A was an expediter, a business person who, among other services, assists homeowners and property developers in applying for and receiving City approval for construction projects. Unbeknownst to CLADOVAN, VALENTINO, and ZIROLI, as of May 2007, Individual A was cooperating with the government.

2. From on or about June 6, 2007 through on or about August 7, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

PETRU CLADOVAN,

defendant herein, corruptly gave, offered and agreed to give anything of value, namely \$2000 in U.S. Currency, to any person, namely Individual A, with intent to influence and reward an agent of the City of Chicago, in connection with any business, transaction, and series of transactions, involving anything of value of \$5,000 or more, namely a Certificate of Occupancy for the Washington property,

the City of Chicago being a local government that received in excess of \$10,000 in federal funding in a twelve- month period from August 8, 2006, through August 7, 2007;

In violation of Title 18, United States Code, Section 666(a)(2).

**COUNT TWO**

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations of Paragraph One of Count One of this indictment are hereby realleged and incorporated as if fully set forth herein.

2. From on or about July 17, 2007 through on or about August 8, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

ANTHONY VALENTINO,

defendant herein, being an agent of the City, corruptly solicited and demanded for the benefit of any person, and accepted and agreed to accept, anything of value, namely \$500 in U.S. currency, from any person, namely Individual A, intending to be influenced and rewarded in connection with a business and series of transactions of the City of Chicago, involving anything of value of \$5,000 or more, namely a zoning inspection and Certificate of Occupancy for the Washington property, the City of Chicago being a local government that received in excess of \$10,000 in federal funding in a twelve- month period from August 9, 2006, through August 8, 2007;

In violation of Title 18, United States Code, Section 666(a)(1)(B).

**COUNT THREE**

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations of Paragraph One of Count One of this indictment are hereby realleged and incorporated as if fully set forth herein.

2. From on or about July 10, 2007 through on or about August 8, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

THOMAS ZIROLI,

defendant herein, being an agent of the City, corruptly solicited and demanded for the benefit of any person, and accepted and agreed to accept, anything of value, namely \$500 in U.S. currency, from any person, namely Individual A, intending to be influenced and rewarded in connection with a business and series of transactions of the City of Chicago, involving anything of value of \$5,000 or more, namely a ventilation inspection and Certificate of Occupancy for the Washington property, the City of Chicago being a local government that received in excess of \$10,000 in federal funding in a twelve- month period from August 9, 2006, through August 8, 2007;

In violation of Title 18, United States Code, Section 666(a)(1)(B).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY